

ATTACHMENT 3

STAVIS SEAFOODS, INC. (“STAVIS”) INFORMATION REQUEST

Guidance on How to Respond. You must submit all responsive documents. Please respond separately to each of the questions, referencing each question by paragraph or subparagraph number in your answer. The response must include copies of all documents that you reference in your response or which you feel are relevant to the information being requested.

As part of your response, please complete the enclosed declaration and provide a cover letter carefully specifying what documentation is included to answer each question. (If documents requested in response to one item duplicate those requested by another question, submit only one copy of the documentation.) Your submission must be a self-explanatory, complete response that is dated and signed by an authorized facility official.

Continuing Obligation to Provide/Correct Information. If additional information or documents responsive to these questions become known or available after answering this request, including, but not limited to, specific information that may be deemed unknown at the time of your response, EPA hereby requests, pursuant to Section 114(a)(1) of the CAA, 42 U.S.C. § 7414(a)(1), Section 3007 of RCRA, 42 U.S.C. § 6927, and Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), that you supplement your response to EPA within ten (10) days of discovering such information. If at any time after the submission of this response, you discover or believe that any portion of the submitted information is incomplete or misrepresents the truth, notify Leonard Wallace of this fact as soon as possible and provide EPA with a corrected response.

Confidential Business Information (“CBI”). The information requested herein must be provided even though Stavis may contend that it includes possible confidential information or trade secrets. You may, if you desire, assert a confidentiality claim covering part or all of the information requested, pursuant to Section 114(c) of the CAA, 42 U.S.C. § 7414(c), Section 3007(b) of RCRA, 42 U.S.C. § 6927(b), Section 104(e) of CERCLA, 42 U.S.C. § 9604(e), and 40 C.F.R. Section 2.203(b), by attaching to such information at the time it is submitted a cover sheet, stamped or typed legend, or other suitable form of notice employing language such as “trade secret,” or “proprietary,” or “company confidential.” Information covered by such a claim will be disclosed by EPA only to the extent, and only by means, of the procedures set forth in the statute and regulation identified above. If no such claim accompanies the information when it is received by EPA, it may be made available to the public by EPA without further notice to you. You should read the above cited regulations carefully before asserting a business confidentiality claim, since certain categories of information are not properly the subject of such a claim.

Please note the burden of proof is on you to demonstrate that information claimed as confidential satisfies the criteria set forth in 40 C.F.R. § 2.208. If any portion of your response contains information which you claim as confidential, you must submit two copies of any such “confidential business information” in accordance with the following procedures:

- 1) The first copy of any document containing such “confidential business information” must be complete and contain all information. Additionally, each such page must be marked conspicuously to indicate that it is claimed as confidential. This copy must be submitted in hard copy form.
- 2) The second copy of any document that is subject to a CBI claim must be redacted so that it contains only information that is not claimed as confidential.

Definitions. The following definitions shall apply to the following words as they appear in this Attachment 2:

The term “you” or “Stavis Seafoods, Inc.” or “Stavis” shall include Stavis Seafoods, Inc. and Stavis Seafoods Limited Partnership, the addressees of this Request, the addressees’ officers, managers, employees, contractors, trustees, partners, successors, assigns, and agents.

The term “person” shall have the same definition as in Section 302(e) of the CAA; Section 1004(15) of RCRA, and Section 101(21) of CERCLA, 42 U.S.C. § 9601(21) (*i.e.*, an individual, trust, firm, joint stock company, corporation (including a government corporation), partnership, association, State, municipality, commission, political subdivision of a State, interstate body, or any agency, department, or instrumentality of the United States, and any officer, agent, or employee thereof).

The term “Facility” means the fresh and frozen seafood processing and distribution facility (including all physical structures) operated by Stavis at 7 Channel Street, Boston, Massachusetts 02210.

The term “document” means any object that contains, records, stores or presents information, whether in paper, electronic or any other form. The term “document” includes the original or an identical and readable copy thereof, and all non-identical copies (whether different from the original by reason of notation made on such copies or otherwise).

The term “identify” means, with respect to a natural person, to set forth the person’s name, present or last known business address and business telephone number, present or last known home address and home telephone number, and present or last known job title, position or business.

The term “identify” means, with respect to a corporation, partnership, business trust or other association or business entity (including a sole proprietorship), to set forth its full name, address, legal form (*e.g.*, corporation, limited liability company, partnership, etc.), organization, if any, and a brief description of its business.

The term “identify” means, with respect to a document, to provide its customary business description, its date, its number, if any (invoice or purchase order number), the identity of the author, addressor, addressee and/or recipient, and the substance or the subject matter.

The term “raw material(s)” means all chemicals or other materials, regardless of whether they are provided by a Stavis customer or purchased by Stavis, that are used or have been used by Stavis to formulate, mix, package, and/or process products for its customers.

The terms “and” and “or” shall be construed either disjunctively or conjunctively as necessary to bring within the scope of this Information Request any information which might otherwise be construed to be outside its scope.

All terms not defined herein shall have their ordinary meaning, unless such terms are defined in the Clean Air Act, the Resource Conservation and Recovery Act, the Comprehensive Environmental Response, Compensation, and Liability Act, or their implementing regulations, in which case the statutory or regulatory definitions shall apply.

A requested document, item or information shall be deemed to be in your possession, custody or control if you know where it is and can obtain access to it, even if it is not presently in your possession.

Stavis Seafoods Information Request Questions

Provide a separate numbered response to each numbered paragraph or subparagraph below. To the extent that you believe that you have answered a question in another section, please refer to the section and answer you have provided.

A. Company Background:

Provide the following information about the Stavis Seafoods businesses, including, but not limited to, Stavis Seafoods, Inc. and Stavis Seafoods, LP:

1. Describe the ownership and business structure of the Stavis Seafoods businesses, including the relationship between Stavis Seafoods, Inc. and Stavis Seafoods, LP;
2. Indicate the date(s) and state(s) of incorporation of the Stavis Seafoods businesses, including Stavis Seafoods, Inc. and Stavis Seafoods, LP;
3. Identify all corporate officers by name and job title;
4. Identify any parent and subsidiary corporations and divisions;
5. Provide the net worth of the Stavis Seafoods businesses;
6. Identify the owner of the property located at 7 Channel Street, Boston, MA 02210 (“the Facility”). Identify the owner of the Facility building at the property, if different than the property owner.
7. The following questions pertain to the Stavis Seafoods Facility located at 7 Channel Street, Boston, MA 02210.

B. Facility Employees:

8. Identify who was responsible for environmental compliance at the Facility as of March 23, 2016.
9. Identify who is currently responsible for environmental compliance at the Facility.
10. Designated Operator of Ammonia Refrigeration System:
 - i. Describe the nature of Brian Caron’s employment at the Facility, including job title(s) and dates of employment in each job function.
 - ii. Identify who was the Facility’s designated operator of the ammonia refrigeration system prior to Brian Caron and the dates of his/her tenure in this position.
 - iii. Provide information, including training records, on who will be the Facility’s designated operator of the ammonia refrigeration system going forward.
 - iv. Provide information about all other employees at the Facility who worked on and/or maintained the Facility’s ammonia refrigeration system.

11. Identify any employees at the Facility who have been trained as Hazardous Materials (“HazMat”) technicians (OSHA Level 3).
12. Identify any employees at the Facility who have had incident commander training and provide all incident commander training records.

C. Facility Inspection Documents: (For questions 14-16, Stavis Seafoods need only supply EPA with reports that pertain to the ammonia refrigeration system and the room below the Ammonia Machinery Room.)

13. Provide copies of all correspondence from the Facility’s insurance company(ies) regarding the Facility’s ammonia refrigeration system, including, but not limited to, insurance inspection reports, ammonia system evaluations made for insurance purposes, and customer letters from insurance auditors for the Facility.
14. Provide a copy of any Boston Inspectional Services inspection reports for the last three years.
15. Provide a copy of any Boston Fire Department inspection reports for the last three years.
16. Provide copies of all materials, including permit applications, submitted by the Facility to the Boston Fire Department pursuant to 527 CMR 33.04.
17. Provide copies of all evaluations of the Facility’s ammonia refrigeration system made by any third parties, including, but not limited to, contractors bidding to perform maintenance activities at the Facility.
18. Provide copies of any and all photographs of the ammonia refrigeration system at the Facility from 2014 to the present.

D. Technical Information about the Facility’s Ammonia Refrigeration System and Process Hazard Review:

19. Provide a copy of any Block Flow Diagram for the Facility’s ammonia refrigeration system.
20. Provide a copy of any piping and instrumentation diagrams (P&IDs) for the Facility’s Ammonia Machinery Room. Also, there appeared to be a more comprehensive P&ID for the Facility in American Refrigeration Company’s files, but the P&ID posted in the Ammonia Machinery Room was missing equipment in the Ammonia Machinery Room. Did Stavis have a complete P&ID at the Facility itself?
21. Provide specification sheets and user manuals for the ammonia monitoring system used to detect ammonia leaks in the Ammonia Machinery Room, Coolers, and Freezer.
22. Provide specification sheets and user manuals for the Facility’s portable combustible gas meter.
23. Provide a copy of any maintenance and calibration records for the portable combustible gas meter for the past three years.

24. Provide ventilation design records and calculations for the Ammonia Machinery Room and the Maintenance Storage Room below.
25. Provide specification sheet and user manuals for the automatic ventilation system in the Ammonia Machinery Room and the Maintenance Storage Room below, including, but not limited, to intake louvers and exhaust fans.
26. Provide the ammonia refrigeration system relief valve header sizing calculations and documents sufficient to show the relief system design, the design basis, and maintenance for any and all pressure relief valves on the Facility's ammonia refrigeration system.
27. Provide the specification sheet, user manual and any other documents that describe the functioning of the M&M Refrigeration Process Control System and Monitor.
 - i. Provide documents that describe what the alarm codes mean.
 - ii. Describe and provide documents showing how the emergency/remote controls outside the Ammonia Machinery Room function.
 - iii. Describe and provide documents regarding what equipment and/or electrical systems are shut down by the Facility's M&M Refrigeration Control System, including what ammonia levels cause the system to shut down and which fans are activated.
28. Provide any written process hazard reviews that Stavris Seafoods or its contractors have conducted since 2003. Also, the Ammonia Refrigeration Management Program obtained from Mr. Caron's computer contains a hazard review checklist that is blank except for the first page. If available, provide the completed version of that checklist.
29. Provide a list of all intrinsically safe equipment in the Ammonia Machinery Room.
30. Provide any and all specification sheets or other documents related to the pipe attached to the bottom of the Pilot Receiver that was damaged during the March 23, 2016 ammonia release from the Facility.
31. For the Facility's four oil separator tanks in the Facility's Ammonia Machinery Room, provide: (a) all design specification information; (b) as-built documentation; and (c) photographs of the nameplates of each tank.

E. Training Records for Facility Employees (If these training records are voluminous or include records for numerous employees who have not been employed at the Facility in the last five years, Stavris may discuss with EPA whether it is appropriate to narrow this request):

32. Provide a copy of safety and health training records for all Stavris employees at the Facility who entered the Ammonia Machinery Room, even periodically, including for emergency response (*e.g.*, HazMat Team members), chemical hazard communication and electrical safety training.
33. Provide a copy of First Responder (Awareness) training records for all Facility employees.
34. Provide a copy of HazMat technician training records.

- 35. Provide a copy of Incident Commander training records.
- 36. Provide a copy of any First aid and CPR training records
- 37. The training log in the Facility's Ammonia Refrigeration Management Program obtained from Mr. Caron's computer is blank. Is there a filled-out version of that log? If so, please provide it.

F. Ammonia Refrigeration Management Program:

- 38. Provide a complete copy of any written Process Safety Management (PSM) or Ammonia Refrigeration Management program, including any PSM-related program prepared for the Commonwealth of Massachusetts.
- 39. Provide a copy of any company Safety Manual information that relates to ammonia, electrical safety, and ladder safety.
- 40. Provide a complete set of operating procedures that relate to the ammonia refrigeration system.
- 41. Provide a copy of the company's written hazard communication program.
- 42. Provide a copy of any documentation of emergency response or emergency evacuation drills for the past 3 years, including any evaluation of responses / drills performed.
- 43. Provide the name(s) and contact information for any persons or company that performed work at the Facility within the last three years in the Ammonia Machinery Room area. Supply a copy of all documents for the work performed.
- 44. Provide documentation of any medical surveillance of HazMat Team members.
- 45. Provide a copy of any personal protective equipment (PPE) hazard assessment for the facility including any monitoring / evaluation done to determine the level of protective equipment required for HazMat team members.
- 46. Provide a copy of any written respirator program.
- 47. Provide a copy of any emergency eye wash / shower inspections and servicing records.
- 48. State where PPE was kept for routine oil draining operations. Also, state whether employees typically wore PPE when draining oil in the Ammonia Machinery Room.

G. Maintenance of the Ammonia Refrigeration System at the Facility:

- 49. Provide copies of all documents related to maintenance, including maintenance logs, that were created and/or kept by Brian Caron regarding the Ammonia Refrigeration System at the Facility.
- 50. Provide a list of any industry standards that the Facility used to govern the inspection, testing, and maintenance of its ammonia refrigeration systems.

51. Provide a timeline of the ammonia refrigeration system equipment upgrades, installations, and/or renovations at the Facility, including ammonia inventories, from 1984 to the present. Provide the contracts for this work. Also provide any written evaluations used to manage changes made to the refrigeration system.
52. Provide copies of all orders and invoices for work performed for the last three years on the Facility's ammonia refrigeration system, including repairs.
53. Provide a timeline for all anhydrous ammonia that was charged into the Facility's ammonia refrigeration system, including quantities of anhydrous ammonia.
54. Provide a timeline of all times the ammonia refrigeration system was pumped out, the quantity of ammonia that was pumped out, and when any ammonia releases occurred.
55. Provide copies of the maintenance records for all the exhaust fans in the Ammonia Machinery Room area for the last three years.
56. Provide copies of the maintenance records for all the powered louvers in the Ammonia Machinery Room area for the last three years. Also, during the March 24, 2016 and the April 6, 2016 inspections, the louvers were not working. Specify how long the louvers had not been working before those dates.
57. Provide any and all documents related to the maintenance of the M&M ammonia monitoring system at the Facility including documents related to ammonia sensor calibration and sensor replacement, from January 1, 2012, to the present.
58. According to the M&M system's monitor printout, ammonia detectors were disabled in the Ammonia Machinery Room from January 28, 2016 through March 2016 although, from the printout, the detectors appeared to be reading out levels of ammonia in parts per million. Describe the functionality and problems with the detectors during this time frame and specify whether the detectors were automatically triggering alarms and the ventilation system during that time.
59. Provide a copy of any documents describing any boiler and pressure vessel testing performed by any third party since 2003, including any testing of piping for corrosion, wear, etc.
60. Provide any and all documents related to the maintenance of the Pilot Receiver involved in the ammonia release on March 23, 2016 at the Facility, and any and all documents related to the maintenance of the materials that were directly attached to the Pilot Receiver, including the pipe that was damaged on March 23, 2016.
61. Provide a copy of any maintenance and testing records for valves associated with the refrigeration system since 2003.
62. Specify how long the white tub of oil depicted in photo P3230056 had been present and full of oil before the ammonia release occurred on March 23, 2016. Also, state whether any oil draining activities were planned for March 23, 2016.
63. Provide logs for oil draining from the equipment in the Ammonia Machinery Room.

64. The preventative maintenance documents downloaded from Mr. Caron's computer on March 24, 2016 only contained the cover page for the Ammonia Refrigeration Management Program's "Preventative Maintenance" section. Please provide the rest of that section, if available.
65. Provide any and all communications regarding any and all problems with or concerns about the ammonia refrigeration system at the Facility between 2008 and the present, including any documents related to complaints about the ammonia refrigeration system made by employees or others.
66. Provide any and all documents related to any decisions Stavix made not to: (a) purchase parts for the ammonia refrigeration system at the Facility; (b) update the ammonia refrigeration system at the Facility; and (c) perform maintenance on the Facility's ammonia refrigeration system.
67. Provide any and all documents related to Stavix' consideration and decisions regarding closing or moving the Facility that involve the Facility's ammonia.
68. Provide a copy of all recordings, including video and audio, from the Facility's security monitoring system, including video cameras, from midnight, March 23, 2016 through midnight March 24, 2016. In particular, EPA is interested in obtaining the feed from the security camera opposite the blue main door to the AMR/maintenance area.

H. American Refrigeration Company, Inc. ("ARC"):

69. Describe ARC's roles and responsibilities at the Facility.
70. Provide any and all agreements and modifications to agreements between you and American Refrigeration Company ("ARC") related to the Facility for the last three years, including, but not limited to: "ARC Maintenance Books – Preventative Maintenance Agreement (January 1, 2015 – December 31, 2015).
71. Provide a list of all ARC employees who performed work at the Facility in the last three years and provide copies of their training records.
72. Provide any and all documents related to Brian Caron's communications with ARC between March 20, 2016 and March 23, 2016, including any telephone records, e-mails, letters, text messages, or other correspondence.

I. Chemicals at the Facility:

73. Provide an inventory of all chemicals at the Facility, including Safety Data Sheets (SDSs) for each chemical, including, but not limited to:
 - i. An inventory of the amount of anhydrous ammonia at the Facility in the last three years;
 - ii. An inventory of the amount of Lead Acid Batteries in the electric forklifts and trucks at the Facility in the last three years; and,
 - iii. An inventory of the amount of Glycol solution at the Facility and the type of Glycol in the Facility's system for the last three years.

74. Provide a copy of all EPCRA chemical inventory reports filed since 2014 and specify the state or local agencies with which they were filed.
75. Provide a copy of any EPCRA follow-up reports submitted to state and local agencies pursuant to 40 C.F.R. § 355.40(b).
76. Provide all records of ammonia deliveries to the Facility from 2003 to the present.

J. Compliance with the Resource Conservation and Recovery Act (RCRA):

77. The following questions relate to a letter, dated April 14, 2016, from Tanner Industries, Inc. to Mr. Carlos Rita, American Refrigeration Company, Inc. In the letter, Tanner Industries described how ammonia was removed from the Facility on April 1, 2016. The letter described the removed ammonia as “‘off-spec’ material (poor quality).” With regard to the characterization of this material, please respond to the following questions:
 - i. Quantify the amount of ammonia removed from Facility on April 1, 2016;
 - ii. Completely describe all factors that were considered in characterizing this material as “off-spec.” If any type of field or laboratory analysis was conducted on the ammonia removed from the system to make this conclusion, please provide copies. If methods other than laboratory analysis were used to make this determination, fully describe these considerations, and how they support the removed material as not being subject to RCRA;
 - iii. Identify the person or persons responsible for characterizing the removed ammonia as a hazardous material. Please provide contact information for this (these) people, including work telephone numbers, and e-mail addresses; and,
 - iv. Provide complete copies of the shipping documents used to transport the material removed from the Facility on April 1, 2016 to its ultimate destination.
78. On April 4, 2016, 500-gallons of ammonia-contaminated water was removed from the Facility. This material was shipped to Tradebe in Newington, NH as non-regulated waste. With regard to the characterization of this material, please respond to the following questions:
 - i. Completely describe all factors that were considered in characterizing this material as non-regulated material. If any type of field or laboratory analysis was conducted on this material to make this conclusion, please provide copies. If methods other than laboratory analysis were used to make this determination, fully describe these considerations, and how they support the removed material as not being subject to RCRA; and,
 - ii. Identify the person or persons responsible for characterizing the removed ammonia as a hazardous material. Please provide contact information for this (these) people, including work telephone numbers, and e-mail addresses.
79. The following questions relate to material removed from the Facility on April 5, 2016. On April 5, 2016, 500-pounds of waste mineral oil was removed from the Facility. This material was shipped to Clean Harbors, Braintree, MA as non-regulated waste. With regard to the characterization of this material, please respond to the following questions:

- i. Completely describe all factors that were considered in characterizing this material as non-regulated. If any type of field or laboratory analysis was conducted on this material to make this conclusion, please provide copies. If methods other than laboratory analysis were used to make this determination, fully describe these considerations, and how they support the removed material as not being subject to RCRA; and,
- ii. Identify the person or persons responsible for characterizing the removed ammonia as a hazardous material. Please provide contact information for this (these) people, including work telephone numbers, and e-mail addresses.

K. Questions Regarding Facility's Ammonia Release Emergency Response Plan:

80. Identify who developed the Facility's Ammonia Release Emergency Response Plan ("ERP") and when it was developed. Provide a final signed copy of the ERP.
81. Identify the Facility's past and current Operations Manager.
82. Identify and describe the role of Vice President of Operations/Operations Manager as mentioned in Section 1.2.1(a) of the ERP.
83. Describe and distinguish the "incident response team," "incident team," and "emergency response team" that are mentioned in Section 1.2.1(f) and (h) of the ERP.
84. Identify the shift refrigeration supervisors.
85. Describe how Stavis Seafoods employees would work in conjunction with American Refrigeration Company, Inc. on the Facility's refrigeration system as part of the Incident Team, as mentioned in in Section 1.2.1(h) of the ERP. Identify the Stavis Seafoods employees who coordinate with American Refrigeration Company, Inc.
86. Describe what is meant by "Sound the gas alarm" in Section 1.2.1(h) of the ERP.
87. Describe how the Facility would find the source of any ammonia releases at the Facility. Describe how the Facility can measure ammonia concentrations if a release occurs.
88. Identify the Plant Safety Director described in Section 1.2.2 of the ERP.
89. According to the ERP, all Facility employees are trained to the Level 1- First Responder Awareness level. Provide first responder awareness training documentation for all employees.
90. Identify the three employees who are described as trained as HazMat Technicians (Level 3). Provide training documentation for these employees.
91. According to Section 1.2.2 of the ERP, the Vice President, Operations Manager, and Plant Engineer will all be trained to Level 5 as HAZMAT Incident Commanders. Identify the personnel who hold these titles and who received this Incident Commander training. Provide training documentation for these employees.

92. According to Section 1.3.1(c) of the ERP, “[the Facility’s] refrigeration department has been designed with intrinsically safe electrical equipment...” Identify and describe this intrinsically safe equipment.
93. Describe the operation of the Facility’s automatic ventilation system including what ammonia concentration causes the automatic ventilation system to activate.
94. According to Section 1.3.1(c) of the ERP, a combustible gas meter must be used in all anhydrous ammonia incidents as a backup for the automatic ventilation system. Identify the location of the combustible gas meter.
95. According to Section 1.3.1(d) of the ERP, a copy of the Facility’s written hazard communication program and copies of all Material Safety Data Sheets are located in the Facility’s Safety Office. Identify the location of the Facility’s Safety Office.
96. Describe how the Facility will determine that an anhydrous ammonia release at the Facility qualifies as “a controlled or incidental release.” Provide examples of “controlled or incidental releases,” describe how frequently they occur, identify who would respond to those releases, and describe how the Facility will determine that these releases can be safely addressed.
97. Section 1.4 of the ERP describes safe distances and places of refuge and refers to a Site Map defined as “Appendix A-1.” Provide a copy of Appendix A-1.
98. Identify the Plant Security Manager mentioned in Section 1.5.1 of the ERP.
99. Identify and describe the portion of the Facility mentioned as the “entire Refrigeration Department” in Section 1.5.2 of the ERP.
100. Define the ERP’s use of the following terms: Exclusion Zone; Reduction Zone; and the Support Zone. Identify these zones on a map of the Facility. Describe how these zones were determined.
101. According to Section 1.6.2 of the ERP, Section 1.6.2 “in conjunction with section 3 of this plan will constitute the emergency procedures for all HAZMAT emergency responders.” Provide a copy of Section 3 of the ERP and the Facility’s ammonia release plan.
102. Section 1.6.2.d of the ERP mentions alternate evacuation routes. Describe how alternate evacuation routes will be designated under the ERP.
103. According to Section 1.7.2 of the ERP (Decontamination—Emergency Procedures), “In the event of [personal protection equipment] failure, retire to the contamination reduction zone as soon as possible. For eye contact, use the eye wash station; for skin contact use the deluge shower after doffing the level B protection.” Identify the location of the Contaminant Reduction Zone. Identify any eyewash stations or showers in this area of the Facility.
104. Provide copies of all of the written critiques of HAZMAT team’s practice and training drills for the last three years, as described in Section 1.10.1 of the ERP.
105. According to Section 1.10.2 of the ERP, all HAZMAT incidents must be critiqued in writing. Provide copies of all written critiques of actual HAZMAT incidents at the Facility for the last

- three years, including any written critique for the March 23, 2016 ammonia release at the Facility.
106. Describe how the level of personal protective equipment listed in Section 1.11.1 of the ERP was determined, including who made the determination and when the determination was made.
 107. Describe the ERP's use of the following terminology in Section 1.11.1 and identify the personnel who hold these titles:
 - i. Contaminated HAZMAT Team B/A Area.
 - ii. Decontamination HAZMAT Team.
 - iii. Area HAZMAT Team Members.
 - iv. HAZMAT Paramedics.
 - v. Support Area Incident Commander.
 - vi. Safety Manager.
 - vii. Operations Manager.
 108. According to Section 1.11.4 of the ERP, Figure A-1 notes the location of all of the Facility's HAZMAT personal protective equipment, fire extinguishers, and fire hose/standpipes. Provide a copy of the ERP's Figure A-1.
 109. Section 1.11 of the ERP describes the personal protective and emergency equipment at the Facility as including SCBA equipment on site. Provide information on any SCBA equipment the Facility has on site, including any inspection and maintenance records.
 110. Section 1.11.3 of the ERP describes the limitations of the Facility's personal protective equipment and personnel. Describe the means, measurement tools, and acceptable limits for the measurements identified in Section 1.11.3 of the ERP.

Instructions: Complete and Include With Your Response.

DECLARATION

I declare under penalty of perjury that I am

the _____ of _____,
[Title] [Name of Facility]

that I am authorized to respond on behalf of

_____, and that the foregoing is a
[Name of Facility]

complete, true, and correct response.

Executed on _____
[Date]

[Signature]

[Type Name and Title]